

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

KAREN SAUNDERS,	)	
	)	
Plaintiff,	)	Case No. 1:17-cv-00335
	)	
v.	)	
	)	
DYCK O'NEAL, INC.,	)	Hon. Judge Gordon J. Quist
	)	Hon. Mag. Judge Ray Kent
Defendant.	)	

**PLAINTIFF'S MOTION TO COMPEL PRODUCTION**

Pursuant to Fed. R. Civ. P. 26, 33, 34, 36, and 37, Plaintiff Karen Saunders respectfully moves that the Court enter an order: (1) compelling Defendant Dyck O'Neal, Inc. ("Dyck O'Neal") to produce full and complete responses to Plaintiff's Second Set of Discovery Requests to Defendant; (2) deeming DONI to have waived objections; (3) deeming Plaintiff's requests for admission admitted; and (4) granting such other and further relief deemed reasonable and just.

This Motion is based on the Brief in Support and all arguments and legal authorities and exhibits thereto.

Dated: October 30, 2018

Respectfully submitted,

KAREN SAUNDERS

By: s/ Alexander H. Burke

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**PROOF OF SERVICE**

I hereby certify that, on October 30, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Alexander H. Burke